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March 24, 1993

APR 6 1993

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

FCC MAIL ROOM

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Re: PR Docket 92-235

APR - 7 1993

Dear Ms. Searcy:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

As a member of a local agency providing emergency services to the public, I would respectfully like to submit comments on the "Refarming" proposal.

As a provider of fire and related emergency services in a largely rural area of central California, we operate over a relatively wide geographical area. Required reduction in power could, in many instances, reduce coverage below acceptable levels of performance for the day-to-day operation of our public safety agencies. Further, reduction in the allowable levels of modulation may degrade the signal-to-noise ratio, further reducing the effectiveness of our present system.

Based on the best information available to us, virtually none of our existing radio communication system could effectively be converted or modified to meet the new technical standards. Much of this equipment is relatively new, being purchased in the last five years. "Narrow banding" or reducing channel bandwidth will render even this, as well as older equipment, obsolete and non-usable.

Further purchase of equipment for replacement to meet new standards is virtually out of the question, given the fiscal situation currently facing local government in California.

~~Funding is marginal for required maintenance on existing systems~~

The elimination of service block frequency allocations will complicate an already complex system of coordination. With the proliferation of communications system needs in the public sector, APCO and IMSA currently have a tremendous responsibility to manage specific blocks of spectrum. This would be adversely